

98E

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )  
                                  )  
                                  )  
v.                            ) No. 11 CR 4  
                                  )  
                                  ) Judge Harry D. Leinenweber  
CAROLE SIMMONS              )  
ELLIE STEWART              )  
GREGORY WALKER            )  
TAYNA MCCHRISTION          )  
KAEVA POWELL              )  
BRIAN WADE                )  
DANIEL HABEEL              )

**PROTECTIVE ORDER RELATING TO DISCOVERY**

Upon the government's motion for a protective order, it is hereby ORDERED as follows:

1. All materials produced by the government in preparation for, or in connection with, any stage of the proceedings in this case, including but not limited to: financial institution records; tax records; payroll records; and any documents and tangible objects produced by the government, shall remain the property of the United States. Upon conclusion of the trial and any appeals of this case or upon the earlier resolution of charges against the defendants, all such materials and all copies made thereof shall be returned to the United States or destroyed, unless otherwise ordered by the Court. All copies withheld by the defense by express order of this Court shall be preserved only so long as is necessary for further proceedings related to this case, after which they shall be returned to the United States or destroyed. The Court may require a certification as to the disposition of any such materials.

2. All materials provided to the defense by the United States may be utilized by the defendants and their counsel solely in connection with the defense of this case and for no other

purpose and in connection with no other proceedings. The materials and their contents shall not be disclosed either directly or indirectly to any person or entity other than the defendants, defendants' counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure. Any notes or records of any kind that defense counsel or the defendants may make in relation to the contents of materials provided by the government shall not be disclosed to anyone other than the defendants, defendants' counsel, and persons employed to assist the defense, or such other persons as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

3. The materials shall not be copied or reproduced except so as to provide copies of the materials for the use by each defense lawyer and defendant and such persons as are employed to assist in the defense, and such copies and reproductions shall be treated in the same manner as the original matter.

4. The restrictions set forth in this order do not apply to documents that are public record, including but not limited to, trial transcripts, documents, recordings, or other materials that have been received in evidence at this or other trials; or documents that are otherwise in the public domain.

ENTER:

  
Hon. Harry D. Leinenweber

Date: 1/12/11